

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

JAMES IRVING DALE,
Plaintiff,

-VS.-

JOEL L. BROTT, Et. Al.,
Defendants.

MOTION FOR DISCOVERY

CIVIL NO. 12-383 (PJS/JSM)

COMES now the Plaintiff, James Irving Dale, Pursuant to Federal Rule of Civil Procedure 26 and hereby requests the defendants produce the following:

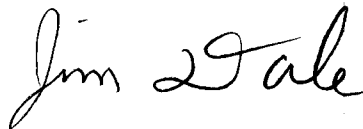
1. Copies of any and all Grievances and or Requests for Administrative Remedy filed by the plaintiff while he was incarcerated in the Sherburne County Jail, along with the Defendants response to said Grievances and Requests for Administrative Remedy's.
2. Any and all disciplinary reports or disciplinary warnings written by any of the Defendants, or any other Sherburne County Correctional Officers, regarding the Plaintiff. Along with any type of disciplinary actions, or disciplinary procedures, taken by any of the Defendants, or other Correctional Officers, regarding the Plaintiff while he was incarcerated in the Sherburne County Jail.
3. Any internal reports, E-Mails, or other type of inner jail correspondence, written or electronic, produced by any of the Defendants which pertain to the Plaintiff. More specifically any correspondence regarding Plaintiff's Pro-Se legal status, religious beliefs or religious diet.
4. The Sherburne County Jail policies on disciplinary procedure, disciplinary proceedings, transferring inmates from one cell block to another for disciplinary reasons, administrative segregation procedures and proceedings, and the policies and procedures on keeping certain inmates separated form other inmates.
5. Any disciplinary reports written by any of the Defendants, or other Sherburne County Correctional Officers, which pertain to the incident between inmate Allen Giller and the Plaintiff on December 19, 2011.
6. Any disciplinary sanctions, or disciplinary actions, taken against inmate Allen Giller for his threats against the Plaintiff on December 19, 2011.



7. Any investigative reports written by any of the Defendants, Sherburne County Sheriff's investigators, or Sherburne County Correctional Officers, which pertain to the threats inmate Allen Giller made against the Plaintiff on December 19, 2011.
8. Any and all disciplinary reports, incident reports, or other documentation written by the Defendants, or other Sherburne County Correctional Officers, which pertain to inmate Allen Giller.

Within 45 days of receipt of this motion, so that the Plaintiff can prepare for trial or any other future motions.

Signed and submitted this 29th day of May, 2012.

A handwritten signature in black ink, appearing to read "Jim Dale". The signature is written in a cursive, flowing style.

James I. Dale
Pro-Se Defendant
13880 Highway 10
13880 Business Center Drive
Elk River, MN 55330